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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92044040
Party	Plaintiff KARIN MODELS, S.A.R.L.
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Submission	Stipulated/Consent Motion to Extend
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Signature	/ews/
Date	03/02/2006
Attachments	Motion for Extension of Time to Respond to Discovery Upon Consent (1).pdf (3 pages)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

KARIN MODELS,
S.A.R.L.,
A Societa A Responsabilita
Limitata, Petitioner,

Cancellation Number: 92044040
Registration Numbers: 2,114,051 and 2,115,957
Mark: KARIN and KARIN MODELS (and design)
International Class: 035

vs.

JEAN LUC BRUNEL,

An Individual,
Respondent.

_____/

**PETITIONER'S MOTION UPON CONSENT FOR EXTENSION OF TIME TO
RESPOND TO RESPONDENT'S DISCOVERY REQUESTS**

Petitioner, Karin Models, S.A.R.L., by and through its undersigned counsel hereby file this Motion to Extend its deadline to comply with Respondent's discovery requests for an additional 15 days and states as follows:

1. Petitioner's responses to outstanding Request for Production and First Set of Interrogatories, served by Respondent, are due on February 28, 2006.
2. Petitioner has been unable to gather all the information being requested by Respondent and hereby requests an additional 15 days to comply with such requests.
3. Petitioner has obtained Respondent's consent for the filing of the instant motion.
4. This motion is made in good faith and not for the purposes of delay.

WHEREFORE, Petitioner, respectfully requests that an extension of the deadline to respond to Respondent's requests be granted up and until March 15, 2006.

Dated: March 2, 2006

Respectfully submitted,

Feldman Gale, P.A.

By: /ews/ Erica W. Stump

Steven E. Eisenberg/ FL Bar No.: 441112

Erica W. Stump/ FL Bar No.: 427632

Attorneys for Petitioner

Attorneys for KARIN MODELS, S.A.R.L

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this document was served by U.S. Regular Mail, postage prepaid, to Respondent's counsel, on this 2nd day of March, 2006, at the following address:

Kozlowski Law Firm, P.A.
Steven Robert Kozlowski, Esq.
The Sterling Building.
927 Lincoln Road, Suite 118
Miami Beach, Florida 33139

/ews/Erica W. Stump
Erica W. Stump